



**BEFORE THE PUBLIC UTILITIES COMMISSION OF
THE STATE OF CALIFORNIA**

FILED

04-13-07

04:11 PM

Order Instituting Rulemaking on the Commission's own motion for the purpose of considering policies and guidelines regarding the allocation of gains from sales of energy, telecommunications, and water utility assets.

R.04-09-003

**SUPPLEMENTAL INFORMATION CONCERNING
TURN'S REQUEST FOR COMPENSATION**



THE UTILITY REFORM NETWORK

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April 13, 2007

SUPPLEMENTAL INFORMATION CONCERNING TURN'S REQUEST FOR COMPENSATION

In a Ruling issued on March 28, 2007, ALJ Thomas directed that TURN provide supplemental information showing that the claimed costs for compensation were reasonable.¹ Specifically, the Ruling requests that TURN show that the 138 hours of attorney time, which comprises the bulk of the compensation request, was reasonable.

In the following text TURN further explains the work performed by its two attorneys and one expert witness in this proceeding. TURN subsequently addresses the specific examples of additional information mentioned in the Ruling.

Explanation of Attorney Time

TURN requested compensation for 88.75 hours (Nusbaum) and 51.50 hours (Hawiger), for a total of 138 hours of attorney time. TURN has reviewed the daily time sheets of attorneys Nusbaum and Hawiger² and can provide the following additional explanation of the activities performed by these attorneys:

- Mr. Nusbaum spent 31.5 hours conducting research (generally coded as “research”) on behalf of TURN and DRA on the history of gain on sale policy in energy and telecom; the distinctions between depreciable and non-depreciable property; the

¹ TURN filed a “Request of the Utility Reform Network for Compensation for Substantial Contributions to Decisions 06-05-041 and 06-12-043” in this docket on February 16, 2007 (hereinafter “Compensation Request”).

² These time sheets were included in Appendix A in the Amendment to the Compensation Request served on February 21, 2007, and attached to this pleading.

application of gain on sale policies in other states; the economic theory underlying gain on sale allocation; and the Redding II decision. Mr. Nusbaum read over 400 pages of law review articles and utility economics articles concerning these issues and prepared a memo summarizing the research to support joint strategy and positions.

➤ Mr. Nusbaum spent 14.25 hours on the issue of whether ILECs should be permitted to be removed from the proceeding (coded as “TC”). He researched the current application of gain on sale policies to NRF carriers; developed a joint strategy with DRA; and reviewed and edited this section of draft pleadings.

➤ Mr. Nusbaum spent 8.5 hours in 2004 (coded as “GP”) in meetings and conference calls to discuss and develop joint positions, as well as in reading and analyzing the pleadings of other parties. Mr. Nusbaum spent 11.75 hours in 2006 (coded as “GP”) preparing for and attending ex parte meetings in which TURN actively advocated on the issue of allocation of the gain on sale of non-depreciable property, and working on comments concerning the alternate proposed decision (analyzing the alternate proposed decision, reviewing and editing comments on the alternate, reviewing the comments of other parties on the alternate proposed decision).

➤ Mr. Nusbaum spent approximately 18.25 hours (15 in 2004 and 3.25 in 2006) reviewing and editing drafts of joint pleadings and joint comments on proposed decisions (coded as “#”).

➤ Mr. Nusbaum devoted 1.5 hours to the application for rehearing (coded as “AFR”).

➤ Mr. Hawiger spent approximately 14.5 hours drafting sections of pleadings

addressing tax issues and exceptional cases that should not be treated by a general gain on sale rule, including treatment of abandoned plant (coded as “#” or “tax”).³

- Mr. Hawiger spent approximately 5 hours in meetings with DRA addressing policy issues, primarily the issue of risk and the allocation of gain on sale on non-depreciable property (generally coded as “GP”).
- Mr. Hawiger spent approximately 11 hours reviewing and editing joint pleadings and 3.5 hours reading the pleadings submitted by other parties (coded as “#” or “GP”).
- Mr. Hawiger spent 17 hours on the compensation request, which was billed at half the normal hourly rate (coded as “comp”).

Expert Consulting Hours

TURN requests compensation for a total of 7.25 hours of time for Mr. William Marcus. Mr. Marcus provided expert advice and drafted pleadings concerning the specific issue of tax treatment of gain on sale proceeds, potential need for exceptional treatment for certain transactions and the historic treatment of abandoned plant.

TURN suggests that the amount of consulting time requested for compensation in this proceeding is extremely limited and fully justified. For example, Mr. Marcus’ advice and knowledge concerning the unusual precedents concerning gain on sale issues saved much more in legal research costs. Mr. Marcus limited his time by providing short drafts and information

³ We specify “approximately” despite the specific hours identified since some daily entries combined the time spent on different activities (for example, meeting with DRA and drafting a pleading), and an exact allocation is thus impossible.

which were worked into the pleadings by Mr. Hawiger.

Additional Response to Issues Raised in The ALJ Ruling

The Ruling notes that TURN filed only joint pleadings with the DRA, and that TURN specifically noted in its compensation request that DRA took the “laboring oar” on most of the joint pleadings. As a preliminary matter, TURN reiterates (as explained in our compensation request) that this statement was meant as an explanation for the “relatively *low number of hours* spent by TURN on this proceeding,”⁴ given the nature of the issues and the voluminous filings by utilities from all regulated sectors. The Gain on Sale Rulemaking involved the regulated utilities in the energy, telecommunications and water sectors.⁵ TURN’s statement did not in any way imply that TURN was not substantively involved in crafting policy positions and drafting pleadings.

TURN took the lead in drafting the sections concerning tax issues, exceptional cases and abandoned plant. However, as discussed in the compensation request, TURN was substantively involved in conducting research and in formulating the key policy positions concerning the theoretical underpinnings of gain on sale allocation, risk theory and allocation of non-depreciable

⁴ Compensation Request, p. 4.

⁵ For example, the Commission website shows that utilities filed ten separate opening comments (some comments were joint comments by several utilities) on November 8, 2004. Utility parties filed seven separate reply comments. Just reading the various pleadings requires a certain minimum amount of time. TURN attorneys divided the energy and telecom pleading (we were largely silent on water issues) and thus spent a total of less than 15 hours reading the pleadings of other parties.

property.⁶ TURN also contributed to tactical strategies necessary to ensure that legal arguments resulted in effective advocacy.

The Ruling notes that “TURN makes no showing that DRA reasonably required TURN’s participation or expertise in order to adequately advocate its own recommendations.” TURN appreciates the underlying concern about intervenors riding another party’s coattails and charging an inordinate amount of time for little actual work, and TURN understands that filing joint pleadings makes the evaluation of a party’s substantial contribution more complicated.

This is tension inherent in collaborative work that has no easy solution. Attempting to show that TURN “provided a different perspective than DRA’s” that was incorporated in the joint pleadings represents a similar problem as identifying parties’ positions during confidential settlement discussions. TURN cannot in good faith reveal the exact positions and perspectives that were discussed during several meetings between TURN and DRA and that resulted in our joint recommendations, especially on the most critical issue of proposing and supporting of a sharing rate of the gain on sale on non-depreciable property.

TURN can attest that from our perspective we did contribute substantively to the positions taken in the joint pleadings, to the research and analyses underlying those positions as well as to the drafting and editing of the pleadings. In general, TURN does not seek to spend our time on proceedings where it is clear that DRA shares exactly the same perspective as TURN and would not in any way benefit from TURN’s participation. There are any number of proceedings where TURN does not actively participate precisely because we do not believe our

⁶ See, for example, Compensation Request at p. 7.

participation is necessary to advance the interests of residential customers as we perceive them. There are other proceedings where we participate and are closely aligned with DRA, but believe that we can offer particular expertise or assistance or can carve out separate issues to address. There are some proceedings where we decide strategically two voices are better than one when facing the multiple combined forces of several large (gargantuan) utilities and other interest groups. And there are some proceedings where we participate with viewpoints distinctly different from DRA's.

The Ruling also states that "TURN does not provide an accounting of DRA's hours and costs to allow us to evaluate whether the combined level of hours was reasonable relative to the scope and complexity of the proceeding and DRA/TURN's contributions."

TURN cannot provide information regarding DRA's costs, nor do we believe such information is necessary for purposes of evaluating this compensation request. Working with DRA in the concerted fashion that we did minimized the total cost of having the consumer perspective represented in this proceeding. If DRA's hours and costs were inordinately high for its work on these matters, TURN's hours and costs would look particularly efficient. By the same token, if DRA's hours and costs were exceptionally low for that same work on the same issues, TURN would look relatively bad by comparison. But neither scenario would illuminate the question of whether or not TURN's participation was sufficiently efficient to warrant an award of the full amount of compensation.

Rather, it is appropriate for the Commission to evaluate the efficiency of an intervenor's participation given the work that the intervenor undertook in that proceeding. For example, the number of hours spent in a proceeding should bear some relationship to the importance

(financially or from a policy perspective) and/or complexity of the issues presented. TURN can only reiterate our belief that this proceeding required the devotion of considerable resources to advocate on an important policy issue. TURN suggests that a total request that amounts to approximately three weeks of attorney time for a proceeding of this magnitude and issues this important is quite reasonable, and reflects a successful collaboration with DRA.

Finally, TURN notes the somewhat mixed signals the Commission is sending on the subject of intervenors cooperating with DRA in proceedings where the staff's positions are likely to overlap at least somewhat with those of intervenors. In other forums the Commission has strongly encouraged such coordination, even to the point of presenting joint witnesses and cross-examination of utility witnesses.⁷ TURN has a long track record of such coordination in proceedings where our position is similar to positions of other parties. But if the result of such successful coordination, such as we achieved in the instant proceeding, is an additional requirement of more detailed accounting of the exact nature of TURN's contribution to the joint pleadings and analysis and an accounting of the total time spent by both TURN and DRA, it is likely that the Commission will see less such efforts.

TURN hopes that our concern is misplaced, and the request for additional information here reflects nothing more than a reaction to our admission that DRA took the lead in producing

⁷ The Scoping Memo in the Sempra general rate case recently calls on intervenors to "greatly increase the level of coordination and cooperation that they already demonstrate in similar proceedings" and urging all parties, including DRA, to "jointly plan their analysis, avoid repetitive analysis, conduct joint analysis where feasible, and consider joint presentation of witnesses and unified cross-examination of applicants." Scoping Memo in A.06-12-009, February 27, 2007, p. 5.

the joint pleadings and the absence of a task-specific allocation of hours in the compensation request (a level of allocation that has never been required in the past, to TURN's knowledge). If, however, the ALJ Ruling is an indication that such detailed information is going to be required of any pending or future request for compensation that includes work performed in coordination with other parties, TURN recommends that the Commission first provide an opportunity for comments on an approach that appears different than the standard applied to date.

April 13, 2007

Respectfully submitted,

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APPENDIX A

ATTORNEY CONTEMPORANEOUS TIME SHEETS

2/21/2007
2:07 PM

R.04-09-003 Attorney Hours

Page 1

Date	Attorney	Activity	Description	Time Spent
<u>Classification: Open</u>				
12/3/2004	BF	GP	Discuss w/ MH	0.50
Total: BF				0.50
9/20/2004	BN	Research	Research - reviewing OIR; TURN filings...	1.50
9/21/2004	BN	Research	Research	3.50
9/21/2004	BN	GP	Planning mtg w/ORA re GOS	1.00
9/22/2004	BN	Research	Research	6.25
9/23/2004	BN	Research	Research	5.50
9/27/2004	BN	Research	Research/analysis	1.00
9/28/2004	BN	GP	Conf call MH/Bill Marcus	1.00
9/29/2004	BN	Research	Analysis	3.50
9/30/2004	BN	Research	Analysis	2.50
10/7/2004	BN	TC	Review ORA/TURN Draft Jt. Response to SBC/VZ Motion to dismiss	1.25
10/7/2004	BN	TC	Review/analyze SBC/VZ Motions	1.50
10/12/2004	BN	TC	Review/Edits to ORA/TURN response to SBC/VZ Motions	1.50
10/12/2004	BN	TC	Research re SBC/VZ rehearing app	2.00
10/14/2004	BN	GP	Prep for Brown ex parte	1.00
10/14/2004	BN	GP	ORA/TURN conf call prep for Brown ex parte	0.25
10/15/2004	BN	TC	Edits to Jt ORA/TURN response to SBC/VZ Motions	2.50
10/15/2004	BN	GP	Mtg w/ ORA	0.25
10/15/2004	BN	GP	Brown ex parte	0.50
10/19/2004	BN	Research	Research	4.25
10/20/2004	BN	Research	Research	3.50
10/28/2004	BN	#	Mtg w/MH; call to Bill Marcus	0.50
10/28/2004	BN	#	Review latest draft comments	1.00
10/29/2004	BN	#	Mtg w/ORA/MH re draft comments	1.50
11/2/2004	BN	#	Review/edit drfat ORA/TURN Comments	2.00
11/3/2004	BN	TC	Drafting ORA/TURN Response to Surewest/Frontier Motions to Dismiss	5.50
11/4/2004	BN	GP	Reviewing parties comments	1.50
11/5/2004	BN	#	Tel call w/Bill Marcus re GOS exceptions	0.25
11/5/2004	BN	GP	Reviewing parties comments	1.50
11/5/2004	BN	GP	Mtg w/ORA re Reply Comments strategy	1.50
11/16/2004	BN	#	Mtg w/ORA re Reply Comments	1.25
11/16/2004	BN	#	Review ORA/TURN Draft Reply	1.00
11/30/2004	BN	#	Review Joint ORA/TURN Reply Comments	3.00
12/1/2004	BN	#	Review Draft Reply Comments	2.25
12/6/2004	BN	#	Review Draft Reply Comments	1.50
12/7/2004	BN	#	Review Draft Reply Comments	0.75
1/18/2006	BN	GP	Mtg w/DRA re ex parte w/Peevey	0.50
1/18/2006	BN	GP	Ex parte w/Peevey	0.50
1/18/2006	BN	GP	Review comments/replies on PD	1.25
1/30/2006	BN	GP	Mtg w/DRA re ex parte w/Brown	0.25
1/30/2006	BN	GP	Prep for Brown ex parte	0.50
1/30/2006	BN	GP	Ex parte w/Brown	0.50
2/6/2006	BN	GP	Mtg w/ORA re GOS	1.00
2/8/2006	BN	GP	Ex parte mtgs w/Grueneich; Bohn	2.00
3/29/2006	BN	GP	Review/analyze Chong APD	2.25
3/29/2006	BN	GP	Conf call w/DRA re Chong APD	0.25
4/4/2006	BN	GP	Mtg w/DRA re Chong APD	0.75
4/14/2006	BN	#	Review draft comments on Chong APD	1.25
4/17/2006	BN	#	Edits draft comments Chong APD	1.25
4/18/2006	BN	GP	Review parties' comments	1.50

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R.04-09-003 Attorney Hours

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Date	Attorney	Activity	Description	Time Spent
4/24/2006	BN	#	Review draft reply comments Chong APD	0.75
6/9/2006	BN	AFR	Mtg w/DRA re app for rehearing D06-05-041	0.50
6/29/2006	BN	AFR	Review DRA/TURN app. for rehearing	1.00
7/12/2006	BN	GP	Meeting w/DRA re ALJ ruling & comments	0.50
Total: BN				85.75
9/2/2004	MF	GP	Review OIR	0.25
Total: MF				0.25
9/15/2004	MH	#	Read OIR	0.50
9/22/2004	MH	GP	mtg w/ Bill N. re strategy, financial risk and rate base; read OIR; tc w/ Bill Marcus re financial risk	0.75
9/28/2004	MH	GP	mtg w/ bill N and bill M to outline issues re gain on sale	1.50
10/7/2004	MH	GP	Edit Bill's summary of issues and positions	0.75
10/28/2004	MH	GP	Mtg w/ Bill; TC w/ Marcus	0.50
10/29/2004	MH	#	Meet w/ ORA re draft comments; write up section on exceptional cases; read previous 851 cases	3.50
11/2/2004	MH	#	review tax section; tc w/ bill	0.75
11/3/2004	MH	#	final review of joint comments	0.50
11/16/2004	MH	GP	Mtg w/ ORA re reply comments	1.00
12/1/2004	MH	#	Read draft response from ORA; Read utility comments	2.50
12/2/2004	MH	GP	TC w/ Marcus and Weil; Read utility comments;	3.00
12/3/2004	MH	#	Read util comments; draft section on exceptions; edit section on risk	5.00
12/6/2004	MH	#	Edit reply comments; Read cases re abandoned plant; edit exceptions section	3.25
12/14/2004	MH	GP	Read reply comments	0.50
12/7/2005	MH	GP	Read Brown proposed decision	2.25
12/7/2005	MH	GP	Mtg w/ ORA re proposed decision	1.25
12/8/2005	MH	tax	Write up reply on tax issue	1.25
1/4/2006	MH	#	Read and edit draft comments on PD	1.50
1/5/2006	MH	#	Comments on Brown DD: Finalize tax section and summary, review Redding issues; review abandoned plant issues	0.75
1/11/2006	MH	GP	Read comments of utilities on PD	0.50
2/15/2006	MH	GP	Mtg w/ Bill; TC w/ Gamson	0.50
4/16/2006	MH	GP	Edit joint comments on Chong APD	0.75
4/17/2006	MH	GP	Review second draft of comments on Chong APD	0.50
4/20/2006	MH	GP	Mtg w/ DRA to discuss Bohn all-party	1.00
6/23/2006	MH	GP	Read dissent	0.25
7/26/2006	MH	Comp	Comp Request	3.00
7/27/2006	MH	Comp	Comp Request	5.00
7/28/2006	MH	Comp	Comp Request	3.00
2/15/2007	MH	Comp	Comp Request	1.00
2/16/2007	MH	Comp	Comp Request	5.00
Total: MH				51.50
Total: Open				138.00

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R.04-09-003 Attorney Hours

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Date	Attorney	Activity	Description	Time Spent	
Grand Total				138.00	

APPENDIX B

DIRECT EXPENSES

2/21/2007
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R.04-09-003 Expenses

Page 1

Date	Activity	Description	Billed
<u>Activity: \$Lexis Research</u>			
9/30/2004	\$Lexis Research	Lexis Invoice 9/1/04 thru 9/30/04	\$809.00
10/31/2004	\$Lexis Research	Lexis Invoice 10/1/04 thru 10/31/04	\$117.13
12/31/2004	\$Lexis Research	Lexis Invoice 12/1/04 thru 12/31/04	\$40.11
Total: \$Lexis Research			\$966.24
<u>Activity: \$Phone</u>			
8/16/2004	\$Phone	Sprint Invoice; \$.03	\$0.03
11/15/2004	\$Phone	Sprint Invoice; \$0.78	\$0.78
12/15/2004	\$Phone	Sprint Invoice; \$6.47	\$6.47
2/15/2005	\$Phone	Sprint Invoice; \$0.03	\$0.03
1/15/2006	\$Phone	Sprint Invoice; \$0.03	\$0.03
Total: \$Phone			\$7.34
Grand Total			\$973.58

APPENDIX C

CONSULTANT TIME SHEETS

2/21/2007
2:12 PM

R.04-09-003 Consultant Hours

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Date	Attorney	Activity	Description	Time Spent	
<u>Classification: Open</u>					
10/5/2004	JBS--B Marcus	.	1.5 hrs @ \$195; Invoice 9/1 thru 9/30/04	1.50	
12/7/2004	JBS--B Marcus	.	.83 hrs @ \$195; Invoice 11/01/04 thru 11/30/04	0.83	
1/7/2005	JBS--B Marcus	.	3.75 hrs @ \$195.00; Invoice 12/1/04 thru 12/31/04	3.75	
1/31/2006	JBS--B Marcus	.	JBS January Invoice	1.17	
Total: JBS--B Marcus				7.25	
Total: Open				7.25	
Grand Total				7.25	

CERTIFICATE OF SERVICE

I, Larry Wong, certify under penalty of perjury under the laws of the State of California that the following is true and correct:

On April 13, 2007 I served the attached:

**SUPPLEMENTAL INFORMATION CONCERNING TURN'S REQUEST FOR
COMPENSATION**

on all eligible parties on the attached lists to **R.04.09.003** by sending said document by electronic mail to each of the parties via electronic mail, as reflected on the attached Service List.

Executed this April 13, 2007, at San Francisco, California.

/S/

Larry Wong

CALIFORNIA PUBLIC UTILITIES COMMISSION

Service Lists

Proceeding: R0409003 - CPUC - ENERGY, WATER

Filer: CPUC - ENERGY, WATER, TELECOMMUNICATIONS, WATER

List Name: NEW LIST

Last changed: April 4, 2007

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